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OF NEW YORK, INC.**

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May 15, 2022

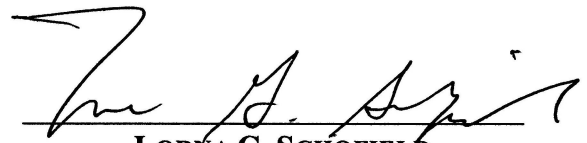
Via ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 43.

Dated: May 17, 2022
New York, New York

**Re: United States v. Willie Dennis
20 Cr. 623 (LGS)**



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield,

We write on behalf of Willie Dennis in the above-captioned matter. As the Court knows, on April 25, 2022, Mr. Dennis renewed his request to remove the home detention and location monitoring conditions of his pretrial release. That request is currently pending before the Court.

We write to raise a separate, but related, request. On May 22, 2022, Mr. Dennis's youngest son will be graduating from college in upstate New York. While the conditions of Mr. Dennis's pretrial release currently do not permit travel to the Northern District of New York, the government and Pretrial Services both consent to Mr. Dennis traveling to and attending this event (with the coordination of Pretrial Services in Florida). We respectfully request that the Court permit Mr. Dennis to briefly travel to the Northern District of New York for this occasion.¹

We recognize the Court's ongoing obligations overseeing a lengthy civil trial and stand ready to provide any additional information the Court may need to address this time-sensitive request.

¹ Mr. Dennis remains hopeful that he may attend his son's college graduation without conspicuously large location monitoring equipment, which may activate and make noise at any time, potentially ruining his son's graduation ceremony and causing him significant shame and embarrassment.

United States v. Dennis
20 Cr. 623 (LGS)

Respectfully submitted,

/s/ Neil Kelly

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cc: AUSA Sarah Kushner
Pretrial Services Officer Joshua Rothman